

STEPHEN J. SORENSEN, Acting United States Attorney (#3049)
KARIN FOJTIK, Assistant United States Attorney (#7527)

Attorneys for the United States of America
185 South State Street, Suite 400
Salt Lake City, Utah 84111-1506
Telephone: (801) 524-5682
Facsimile: (801) 524-4475

FILED WITH

MAR 27 2006

**UNITED STATES
MAJISTRATE JUDGE
SAMUEL ALBA**

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA, : Case No. A-06-110 M
: Plaintiff, :
: : COMPLAINT
vs. :
: :
LELAND JOHN BOWERS, : VIO:18 U.S.C. § 2422(b)
: Defendant : [Coercion and Enticement For Illegal
: : Sexual Activity];

Before Honorable Samuel Alba, United States Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT I
(18 U.S.C. § 2422(b))
(Coercion and Enticement)

On or about March 23, 2006, in the Central Division of the District of Utah,

LELAND JOHN BOWERS,

the defendant herein, did knowingly and intentionally, by means of a facility of interstate

commerce, persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, or attempted to so persuade, induce, entice, and coerce; all violation of Title 18, United States Code, Section 2422(b).

STATEMENT OF FACTS

I, Ken Watson, ("Your affiant"), Federal Bureau Investigation and Parole, being duly sworn, depose and state as follows to wit:

1. Your affiant has been employed as a Special Agent with the Federal Bureau of Investigations since March 2004. I am a member of Utah County Sex Crimes Task Force, and have worked on several cases related to the exploitation of children.
2. As a federal agent, your affiant is authorized to investigate violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
3. This affidavit is made in support of a criminal complaint charging LELAND JOHN BOWERS with attempting to persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to engage in sexual activity in violation of 18 U.S.C. § 2422(b).
4. The information set forth below has come from either personal investigation or has been related to me personally by other law enforcement officers associated with this investigation.

5. Your affiant knows that on March 23, 2006, law enforcement working in an undercover capacity, entered a Yahoo! chatroom using the persona of a 13 year old girl and a screen name "chrissy_sue_1990" This screen name was contacted via Yahoo! Instant Messenger by an individual using the screen name "silversurfer922002." After arrest Bowers admitted to using the screen name "silversurfer922002" on March 23, 2006.

6. At the start of the chat "chrissy_sue_1990" told Bowers she was 13 years old in response to his questions about her age. Initially, Bowers responded indicating he was 22 years old. He also indicated he had only resided in Utah for a few months.

7. Shortly after the chat began Bowers asked "chrissy_sue_1990" if she could find some time to sneak away. The conversation turned sexual and Bowers asked if "chrissy_sue_1990" would provide him with oral sex if they met.

8. Bowers suggested they meet that evening and sent a photograph of his car, a 2004 Lancer. A meeting was arranged at a park in Spanish Fork, Utah.

9. At the time arranged for the meeting officers observed the Lancer from the photograph pull into the parking lot. Bowers was approached by law enforcement and he stated he knew they were there because he had arranged to meet an underage girl. Bowers was arrested, and taken back to the station and read *Miranda* rights. Bowers admitted he had used the screen name "silversurfer922002" when chatting with "chrissy_sue_1990." He initialed all pages of the chat indicating that the transcript of the chat represented what

had occurred with "chrissy_sue_1990." Bowers stated he would have participated in sexual intercourse with "chrissy_sue_1990" if she had been willing. He signed a consent for law enforcement to take his computer.

10. Upon further investigation the Utah County Sex Crimes Task Force discovered that on March 23, 2006, Bowers had also chatted with another undercover officer and asked the officer, who was also posing as a 13 year old girl, "how far have you gone." On September 29, 2005, and May 11, 2005, "silversurfer 922002," chatted with other undercover officers posing as 13 year old girls.

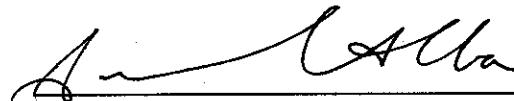
11. I know from experience that Yahoo! is located in Sunnyvale, California and that any transmission from a person using Yahoo! is relayed to and from California. Because defendant and your affiant were using Yahoo! to communicate, the sexually explicit communications traveled in interstate commerce.

12. The defendant, LELAND JOHN BOWERS, attempted to meet the 13 year-old female in Spanish Fork, Utah for purpose of conducting illegal sexual behavior, which act, if completed would constitute a criminal offense under Utah law. Your affiant submits there is probable cause to believe that Bowers violated 18 U.S.C. § 2422(b), Coercion and Enticement for Illegal Sexual Activity.



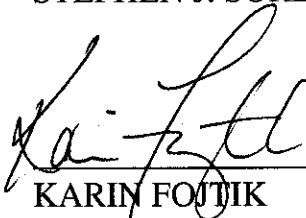
Special Agent Ken Watson
Federal Bureau of Investigations

SUBSCRIBED AND SWORN TO BEFORE ME THIS 27 th DAY OF March, 2006.



Hon. Samuel Alba
United States Magistrate Judge

APPROVED:
STEPHEN J. SORENSEN



KARIN FOSTIK
Assistant United States Attorney